



VIRGINIA  
& AMBINDER LLP  
A t t o r n e y s   a t   L a w

40 Broad Street, 7<sup>th</sup> Floor  
New York, New York 10004  
Telephone: 212.943.9080

**Michele A. Moreno**  
**Partner**  
mmoreno@vandallp.com

June 27, 2024

**VIA ECF**

Hon. Margo K. Brodie, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 6F  
Brooklyn, New York 11201

Re:     *Debora Bayne, et al. v. NAPW, Inc., et al.*  
          18-CV-3591 (MKB)(RER)

Dear Judge Brodie:

This firm is counsel to the Plaintiffs in the above-referenced wage and hour action. I write on behalf of all parties to respectfully request an extension of time to submit the Joint Pre-Trial Order, currently due July 1, 2024. [*See* May 16, 2024 Order.]

The parties have been working diligently on the Joint Pre-Trial Order and have set a date to exchange their respective portions and to confer over stipulations of fact. However, we require more time to complete the Joint Pre-Trial Order due to heavy litigation calendars, further compounded by a recent family emergency that arose for Plaintiffs' counsel.

Accordingly, the parties respectfully request a thirty-day extension to submit the Joint Pre-Trial Order, from July 1, 2024 to August 1, 2024. This is the parties' second request for an extension of this deadline.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Michele A. Moreno

Cc: All counsel of record (via ECF)